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| 10 | UNITED STATES | DISTRICT COURT | |
| 11 | NORTHERN DISTRICT OF CALIFORNIA | | |
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| 13 | INTEL CORPORATION and APPLE INC., | Case No. 3:19-cv-07651-EMC | |
| 14 | Plaintiffs, | STIPULATION AND [PROPOSED] ORDER ADDING DEFENDANTS' JOINT | |
| 15 | V. | MOTION TO STAY DISCOVERY PENDING A RULING ON DEFENDANTS' | |
| 16 | FORTRESS INVESTMENT GROUP LLC, FORTRESS CREDIT CO. LLC, UNILOC | JOINT MOTION TO DISMISS AND STRIKE TO STIPULATED AND | |
| 17 | 2017 LLC, UNILOC USA, INC., UNILOC LUXEMBOURG S.A.R.L., VLSI | ORDERED BRIEFING SCHEDULE (DKT. 75) | |
| 18 | TECHNOLOGY LLC, INVT SPE LLC, INVENTERGY GLOBAL, INC., DSS | | |
| 19 | TECHNOLOGY MANAGEMENT, INC., IXI IP, LLC, and SEVEN NETWORKS, LLC, | | |
| 20 | Defendants. | | |
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| | | STIPULATION AND [PROPOSED] ORDER TO ADD DEFS.' JOINT MOTION TO STAY DISCOVERY TO STIPLIL ATED | |

| 1 | Pursuant to Civil Local Rules 6-1 and 6 | 6-2, plaintiffs Intel Corporation and Apple Inc. | |
|----|----------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|--|
| 2 | (collectively, "Plaintiffs") and defendants Fort | ress Investment Group LLC, Fortress Credit Co. | |
| 3 | LLC, Uniloc 2017 LLC, Uniloc USA, Inc., Ur | niloc Luxembourg S.a.r.l., VLSI Technology LLC, | |
| 4 | Inventergy Global, Inc., INVT SPE LLC, DSS Technology Management, Inc., IXI IP, LLC, and | | |
| 5 | Seven Networks, LLC (collectively, "Defendants") hereby request and stipulate as follows: | | |
| 6 | WHEREAS, this Court approved a stipulation to extend deadlines to respond to the | | |
| 7 | Complaint and set a briefing schedule on motions to dismiss, strike, and/or stay the action; (Dkt. | | |
| 8 | 75); | | |
| 9 | WHEREAS, the parties agree that Defe | endants' Joint Motion to Stay Discovery Pending a | |
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| 12 | IT IS HEREBY STIPULATED AND AGREED by and between the parties, subject to the | | |
| 13 | Court's approval: | | |
| 14 | 1. The briefing schedule already a | approved by the Court in Dkt. 75 shall be applicable | |
| 15 | to Defendants' Joint Motion to | Stay Discovery Pending a Ruling on Defendants' | |
| 16 | Joint Motion to Dismiss and to Strike. | | |
| 17 | | | |
| 18 | IT IS SO STIPULATED. | | |
| 19 | Dated: February 13, 2020 | Respectfully submitted, | |
| 20 | | | |
| 21 | By: /s/ A. Matthew Ashley | By: /s/ Amanda L. Major | |
| 22 | A. Matthew Ashley (Bar No. 198235) mashley@irell.com | Amanda L. Major (<i>pro hac vice</i>) amanda.major@wilmerhale.com | |
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| 26 | LLC, FORTRESS CREDIT CO. LLC, VLSI TECHNOLOGY LLC | Facsimile: +1 202 663 6363 | |
| 27 | , Est Term (oboot Elec | Timothy Syrett (pro hac vice) timothy.syrett@wilmerhale.com | |
| 28 | | William F. Lee (pro hac vice) | |
| | | STIPULATION AND [PROPOSED] ORDER TO ADD DEFS.' IOINT MOTION TO STAY DISCOVERY TO STIPULATED | |

| 1 | /s/ Martin Flumenbaum | william.lee@wilmerhale.com |
|----|-----------------------------------------------------------------|----------------------------------------------------------------|
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| 11 | Telephone: 617 456-8022 Facsimile: 617 456-8100 | Counsel for Plaintiffs INTEL CORPORATION and APPLE INC. |
| 12 | Counsel for Defendant UNILOC 2017 LLC | |
| 13 | /s/ Daniel. R. Shulman | |
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| 18 | Counsel for Defendants UNILOC LUXEMBOURG S.A.R.L. | |
| 19 | UNILOC USA, INC | |
| 20 | | |
| 21 | /s/ Christopher A. Seidl Christopher A. Seidl (pro hac vice) | |
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| 24 | Telephone: 612 349 8468 Facsimile: 612 339-4181 | |
| 25 | Counsel for Defendants INVT SPE LLC | |
| 26 | INVENTERGY GLOBAL, INC. | |
| 27 | | |

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| 1 | /s/ Nathaniel Lipanovich | |
|----|--------------------------------------------------------------------------------------------|--|
| 2 | Nathaniel Lipanovich (Bar No. 292283) | |
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| 5 | Facsimile: 650-325-5572 Counsel for Defendant | |
| 6 | DSS TECHNOLOGY | |
| 7 | MANAGEMENT, INC. | |
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| 12 | IXI IP, LLC | |
| 13 | /s/ Samuel F. Baxter Samuel F. Baxter (pro hac vice) | |
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| 16 | Marshall, TX 75670 Telephone: 903 923-9001 | |
| | Facsimile: 903 923-9099 | |
| 17 | Counsel for Defendant SEVEN NETWORKS, LLC | |
| 18 | | |
| 19 | ORDER | |
| 20 | | |
| 21 | Pursuant to stipulation, IT IS SO ORDERED. | |
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| 23 | DATED: The Honorable Edward M. Chen | |
| 24 | United States District Judge | |
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| | STIPULATION AND [PROPOSED] ORDER TO ADD DEFS. JOINT MOTION TO STAY DISCOVERY TO STIPULATED | |

| 1 | ECF ATTESTATION |
|----|-----------------------------------------------------------------------------------------------|
| 2 | I, Olivia Lauren Weber, am the ECF user whose ID and password are being used to file |
| 3 | this STIPULATION AND [PROPOSED] ORDER ADDING DEFENDANTS' JOINT MOTION |
| 4 | TO STAY DISCOVERY PENDING A RULING ON DEFENDANTS' JOINT MOTION TO |
| 5 | DISMISS AND STRIKE TO STIPULATED AND ORDERED BRIEFING SCHEDULE. I |
| 6 | hereby attest that I received authorization to insert the signatures indicated by a conformed |
| 7 | signature (/s/) within this e-filed document. |
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| 10 | By: <u>/s/ Olivia Lauren Weber</u> Olivia Lauren Weber |
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